

April 30, 2009

VIA ELECTRONIC FILING

Magistrate Judge Ramon E. Reyes, Jr.
 United States District Court
 Eastern District of New York
 United States Courthouse
 225 Cadman Plaza East, Room 263
 Brooklyn, NY 11201

SO ORDERED,
 Dated: Brooklyn, New York
 April 30, 2009
 /s/ Ramon E. Reyes, Jr.
 United States Magistrate Judge

Re: *Web Tracking Solutions, LLC and Daniel Wexler v. Google Inc.*, No. 1:08-cv-03139

Your Honor:

Pursuant to the order entered December 2, 2008 in the above-referenced case (docket no. 27) ("First Scheduling Order"), the parties are scheduled to conduct a telephonic status conference with the Court tomorrow, May 1, 2009. However, the parties do not currently have any disputes to report, and for that reason request that the scheduled May 1 status conference be adjourned.

In lieu of a status conference on May 1, the parties submit this joint request for certain amendments to the First Scheduling Order. These changes will assist in the orderly resolution of the case and avoid unnecessary discovery disputes. This is the first requested amendment to the December 2, 2008 scheduling order.

The below chart summarizes the parties' requested revisions to the case schedule:

Event	Revised Deadline
Exchange proposed claim terms and phrases (First Scheduling Order ¶ 7)	June 10, 2009
Exchange preliminary proposed constructions (First	June 26, 2009

quinn emanuel urquhart oliver & hedges, llp

LOS ANGELES | 865 South Figueroa Street, 10th Floor, Los Angeles, CA 90017 | TEL (213) 443-3000 FAX (213) 443-3100

SAN FRANCISCO | 50 California Street, 22nd Floor, San Francisco, CA 94111 | TEL (415) 875-6600 FAX (415) 875-6700

SILICON VALLEY | 555 Twin Dolphin Drive, Suite 560, Redwood Shores, CA 94065 | TEL (650) 801-5000 FAX (650) 801-5100

TOKYO | Akasaka Twin Tower Main Building, 6th Floor, 17-22 Akasaka 2-Chome, Minato-ku, 107-0052 | TEL +81 3 5561-1711 FAX +81 3 5561-1712

LONDON | 16 Old Bailey, London United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100

Scheduling Order ¶ 8)	
Exchange disputed claim terms charts (First Scheduling Order ¶ 11)	August 4, 2009
Filing of <i>Markman</i> briefs (First Scheduling Order ¶ 12) and disclosure and exchange of <i>Markman</i> expert reports, affidavits, or declarations (<i>id.</i> ¶ 13(a))	September 2, 2009
Completion of initial <i>Markman</i> expert depositions (First Scheduling Order ¶ 13(b))	September 23, 2009
Filing of responsive <i>Markman</i> briefs (First Scheduling Order ¶ 14) and disclosure and exchange of rebuttal <i>Markman</i> expert reports, affidavits, or declarations (<i>id.</i> ¶ 13(c))	October 14, 2009
Completion of rebuttal <i>Markman</i> expert depositions (First Scheduling Order ¶ 13(d))	October 21, 2009
Filing with the Court of a Joint Disputed Claim Terms Chart (First Scheduling Order ¶ 14)	October 21, 2009

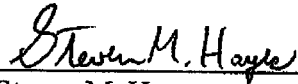
Attached hereto as Exhibit A is a draft order granting these requested changes.

The parties further request that certain hearing dates and related submissions be rescheduled. Subject to the convenience of the Court, the parties propose the following revised dates:

Event	Revised Deadline
Telephonic status conference (First Scheduling Order ¶ 10)	June 29, 2009
Joint status report (First Scheduling Order ¶ 17)	November 10, 2009
Joint status conference (First Scheduling Order ¶ 18)	November 17, 2009
Close of fact discovery (First Scheduling Order ¶ 18)	December 8, 2009

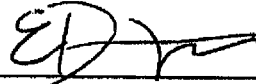
The parties are available to discuss these matters at Your Honor's convenience.

Respectfully submitted,



Steven M. Hayes
HANLY CONROY BIERSTEIN FISHER &
HAYES
112 Madison Avenue, 7th Floor
New York, NY 10016
(212) 784-6414
shayes@hanlyconroy.com

Counsel for Plaintiffs



Edward J. DeFranco
QUINN EMANUEL URQUHART OLIVER
& HEDGES
51 Madison Avenue, 22nd Floor
New York, NY 10010
(212) 849-7106
eddefranco@quinnemanuel.com

Counsel for Defendant